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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RENEE HALE-DRASE,

Plaintiff,

v.

BARCLAYS BANK DELAWARE, *et al.*,

Defendants.

Case No.: 2:24-cv-01801-JCM-NJK

**DEFENDANT BARCLAYS BANK
DELAWARE'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

Defendant Barclays Bank Delaware ("Barclays"), by and through its undersigned counsel and with the consent of the Plaintiff Renee Hales-Drase, respectfully requests a twenty-one (21) day extension of time for Barclays to respond to Plaintiff's Complaint (ECF No. 1). In support of this Motion, Barclays states as follows:

1. Plaintiff filed her Complaint on or about September 25, 2024. (*See* ECF No. 1).
2. Barclays' registered agent received a copy of the Complaint on or about September 26, 2024.
3. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Barclays' response to the Complaint is due twenty-one (21) days after the date of service, meaning that the current deadline for Barclays to respond is October 17, 2024. This Motion for an extension of time is being made before the original time for responding expires.

4. Prior to submitting this Motion, counsel for Barclays conferred with counsel for Plaintiff, who agreed to a twenty-one (21) day extension of time from October 17 for Barclays to file a response to Plaintiff's Complaint. As such, Barclays is requesting that its deadline to respond to the Complaint be extended until November 7, 2024.

5. This extension of time is necessary as Barclays is investigating the facts alleged in the Complaint and requires this extension of time to complete such investigation and prepare an adequate response to the Complaint.

6. Pursuant to Fed. R. Civ. P. 6(b), Barclays respectfully submits that good cause is shown for the requested extension of time to respond to the Complaint.

7. This is Barclays' first extension request and is not sought for the purpose of delay. No party will be prejudiced by the relief sought in this motion.

WHEREFORE, Defendant Barclays Bank Delaware respectfully requests that this Honorable Court grant it an extension of time to respond to Plaintiff's Complaint through and including November 7, 2024, and for such other and further relief that this Court deems necessary and appropriate.

DATED this 17th day of October, 2024.

Respectfully submitted,

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brittni A. Tanenbaum

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ORDER

IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATE: October 18, 2024